Steve M. Dollar
David B. Schwartz
NORTON ROSE FULBRIGHT US LLP
1301 Avenue of the Americas
New York, New York 10019

Tel.: (212) 318-3000 Fax: (212) 318-3400

Kevin J. Harnisch (*pro hac vice*) 799 9th Street NW, Suite 1000 Washington, District of Columbia 20001

Ronald D. Smith (*pro hac vice*) 2200 Ross Avenue, Suite 3600 Dallas, Texas 75201

Attorneys for Defendants Lek Securities Corporation and Samuel Lek

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff.

v.

LEK SECURITIES CORPORATION, SAMUEL LEK, VALI MANAGEMENT PARTNERS d/b/a AVALON FA LTD, NATHAN FAYYER, and SERGEY PUSTELNIK a/k/a/ SERGE PUSTELNIK,

Defendants.

17-cv-01789 (DLC)

NOTICE OF THE LEK DEFENDANTS' MOTION FOR RECONSIDERATION

PLEASE TAKE NOTICE that, upon Defendants Lek Securities Corporation and Samuel Lek's (collectively the "Lek Defendants") Memorandum of Law in Support of their Motion for Reconsideration, and all pleadings, papers and proceedings in this action, the Lek Defendants will move this Court before the Honorable Denise L. Cote at the U.S. Courthouse located at 500 Pearl Street, New York, New York, at a date to be determined by the Court, for an Order pursuant to S.D.N.Y. Local Civil Rule 6.3 granting reconsideration of this Court's April 8, 2019 Opinion &

Order granting Plaintiff's motion to exclude the testimony and opinions of Roger Begelman [Dkt. No. 355], and for such other relief as this Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rule 6.1(b), Plaintiff shall serve opposing papers, if any, no later than 14 days following the date of service of the Motion, and the Lek Defendants shall serve reply papers, if any, no later than 7 days following the date of service of Plaintiff's opposition.

Dated: New York, New York April 22, 2019

## NORTON ROSE FULBRIGHT US LLP

By: /s/ Steve M. Dollar
Steve M. Dollar
David B. Schwartz
1301 Avenue of the Americas
New York, New York 10019

Tel.: (212) 318-3000 Fax: (212) 318-3400 steve.dollar@nortonrosefulbright.com david.schwartz@nortonrosefulbright.com

Kevin J. Harnisch 799 9th Street NW, Suite 1000 Washington, District of Columbia 20001-4501 Tel.: (202) 662-4520

Fax: (202) 662-4520

kevin.harnisch@nortonrosefulbright.com

Ronald D. Smith (*pro hac vice*) 2200 Ross Avenue, Suite 3600

Dallas, Texas 75201 Tel.: (214) 855-8000 Fax: (214) 855-8200

ron.smith@nortonrosefulbright.com

Attorneys for Defendants Lek Securities Corporation and Samuel Lek